

LOVELLS LLP
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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

LEHMAN BROTHERS HOLDING INC., et. al.,

Debtors.

: Chapter 11
:
: Case No. 08-13555 (jmp)
:
: (Jointly Administered)
:
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**VERIFIED STATEMENT OF LOVELLS LLP PURSUANT TO
FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Lovells LLP ("Lovells") as attorneys for the entities listed on Exhibit A hereto (collectively, the "Entities"), in connection with the above-captioned chapter 11 cases of Lehman Brothers Holdings Inc., and its debtor affiliates (collectively, the "Debtors"), makes this Statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure:

1. Lovells has been retained by the Entities in connection with the Debtors' cases.
2. Each of the Entities may hold claims against and/or interests in various Debtors arising at various times pursuant to agreements with the Debtors, and/or under statutory and/or common law and/or at equity. The Entities may also hold additional claims against and/or interests in the Debtors that do not fall within the scope of Lovells' representation of such Entities.
3. The specific nature and amounts of the claims held by the Entities will be set forth in proofs of claim filed against the relevant Debtors' estates.
4. The following are the facts and circumstances in connection with Lovells' employment in these cases. Lovells represented each of the Entities and certain of their affiliates in matters unrelated to Lehman prior to the commencement of the Debtors' chapter

11 cases. Each of the Entities separately requested that Lovells represent them in connection with issues and claims generated by the filing of the Debtors' chapter 11 cases.

5. Lovells also represents or advises, or may have represented or advised, other parties in interest with respect to these cases that have not been included in this Statement because such parties have not instructed Lovells to appear in these cases on their behalf. These parties in interest may include commercial and investment banks, hedge funds, and other financial institutions and parties to various agreements with the Debtors.

6. In the past, Lovells provided certain legal services to certain of the Debtors or their affiliates. In this respect, Lovells possesses claims for legal services rendered to Lehman Brothers Inc., which are being reviewed by Lovells. Lovells may also have similar claims against Lehman entities located in Europe and Asia. In addition, Lovells may at some future time seek to have its fees and disbursements paid by the Debtors' estate pursuant to the Bankruptcy Code. Upon information and belief, Lovells does not hold any equity interest in the Debtors.

7. Lovells reserves the right to supplement or amend this Statement in the future.

8. The undersigned declares under penalty of perjury that the statements made herein are true and accurate, to the best of her knowledge, information and belief.

Dated: New York, New York
December 4, 2008

By: /s/ Robin E. Keller
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EXHIBIT A

<u>Creditor</u>	<u>Address</u>
Standard Chartered Bank	1 Madison Avenue, 3rd Floor New York, NY 10010
Lloyds TSB Bank plc	1251 Avenue of the Americas, 39th Floor New York, NY 10020
QVT Financial, LP	1177 Avenue of the Americas New York, NY 10036
BRE Bank S.A.	ul. Senatorska 18 00-950 Warszawa, P.O. Box 728
Carlton Communications Limited	200 Gray's Inn Road, 7th Floor London, WC1X 8HF, United Kingdom
Instituto de Crédito Oficial	Paseo del Prado 4 28014 Madrid, Spain